THE HONORABLE Brian D. Lynch **CHAPTER 13**

HEARING DATE: August 11, 2015 HEARING TIME: 1:00 p.m. LOCATION: Vancouver, WA

RESPONSE DUE: August 4, 2015

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON

In re:) Case No. 15-42227 BDL Ch. 13
Barry Winston Burnham, Sr. Catalina Burnham) DEBTOR'S OBJECTION TO CLAIM #6) OF WELLS FARGO BANK, NA (MOR) FURNITURE)
Debtor(s)	

Clerk of the United States Bankruptcy Court; and All parties in interest: TO:

PLEASE TAKE NOTICE that Debtor's Objection to Claim #6 IS SET FOR HEARING as follows:

DATE OF HEARING	August 11, 2015
TIME	1:00 pm
JUDGE	Hon. Brian D. Lynch
LOCATION	Federal Building 500 West 12th Street, 2nd Floor Vancouver, WA 98660
RESPONSE DUE	August 4, 2015

IF YOU OPPOSE the motion you must file your written response with the court clerk, and deliver copies to the undersigned and all interested parties NOT LATER THAN THE RESPONSE DATE.

IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion, GRANT THE MOTION PRIOR TO THE HEARING WITHOUT FURTHER NOTICE, and strike the hearing.

MOTION

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COMES NOW the Debtor, by and through their attorney of record, objects to Claim #6 of Wells Fargo Bank NA. in the amount of \$1,914.00. The basis for the objection is as follows:

<u>Case Information</u>: Debtors plan was confirmed on 7/2/15.

Basis for Objection:

A. Debtors did not sign the portion of the contract giving Wells Fargo Bank NA (Mor Furniture) a security interest in the items purchased, therefore the debt is unsecured.

WHEREFORE, Debtor respectfully requests that this Court sustain Debtor's objection and treat Claim #6 as a general unsecured claim.

DATED: July 8, 2015

Respectfully submitted:

/s/ Mark A. Ditton #45432 Mark A. Ditton, WSBA#45432 Attorney for Debtor(s) 14900 Interurban Ave. S. #265 Seattle, WA 98168 206-674-4602 mark@nwrelief.com